

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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PROCTER & GAMBLE PRODUCTIONS, INC.,	:	10 Civ. 7201 (VM)
	:	
Plaintiff,	:	ECF case
	:	
- against -	:	
	:	<u>RULE 26(a)(1) INITIAL</u>
SIGNATURE SOUND, INC., HALFTOOTH	:	<u>DISCLOSURES</u>
RECORDS, LLC, DOROTHY SCHRAGER, <i>in her</i>	:	
<i>capacity as Executor of the Estate of ELLIOT</i>	:	
SCHRAGER, DOROTHY SCHRAGER, <i>in her</i>	:	
individual capacity, and DAVID SCHRAGER,	:	
	:	
Defendants.	:	
-----X	:	
-----X	:	
	:	
DOROTHY SCHRAGER,	:	11 Civ. 4378 (VM)
	:	
Plaintiff,	:	
	:	
- against -	:	
	:	
SINDEE LEVIN,	:	
	:	
Defendant.	:	
-----X	:	

Defendants, Dorothy Schrager in her individual capacity and as executor of the Estate of Elliot Schrager, David Schrager, and Halftooth Records, LLC (the “Schrager Defendants”), by their attorneys, Ingram Yuzek Gainen Carroll & Bertolotti, LLP, make the following disclosures under Fed. R. Civ. P. Rule 26(a)(1).

These disclosures are made to the best of the Schrager Defendants’ knowledge at the time of service. The Schrager Defendants reserve the right to supplement, clarify, or correct these disclosures at any time should additional information become available:

I. Identification of Individuals Likely to Have Discoverable Information

Individuals at Procter & Gamble Productions, Inc.
299 East Sixth Street
Cincinnati, Ohio

Dorothy Schrager
c/o Ingram Yuzek Gainen Carroll & Bertolotti, LLP
250 Park Avenue
New York, New York 10177

David Schrager
c/o Ingram Yuzek Gainen Carroll & Bertolotti, LLP
250 Park Avenue
New York, New York 10177

Sindee Levin
150 S. Barrington Avenue, Suite 1
Los Angeles, California 90049

Wayne Schwaeber
P. Richard Schwaeber PC
6 Marilane
Westport, CT 06880
(203) 226-8001

Devon Soles
45 Pondfield Road West, Apt. 6F
Bronxville, New York 10708

II. Description by Category and Location of Documents

The Schrager Defendants intend to rely on all business records and financial information of Signature Sound, Inc. ("Signature Sound") that were previously produced to Procter & Gamble Productions, Inc. ("PGP"). Those documents are located at PGP's counsel's office at Goldberg Segalla, LLP, and at Signature Sound's counsel's office at Zane and Rudofsky, The Starrett Leigh Building, 601 West 26th Street, New York, New York 10001. The Schrager Defendants also intend to rely on all documents that they have previously produced to PGP's counsel, such as credit card bills. Some or all of these documents are also scanned onto disks

and were delivered to the Schrager Defendants' counsel's office at Ingram Yuzek Gainen Carroll & Bertolotti, LLP, 250 Park Avenue, New York, New York 10177.

The Schrager Defendants will also rely on any documents, customer statements, and records relating to the defendants' accounts that PGP obtains through its non-party subpoenas to P. Richard Schwaeber, P.C., Citibank, N.A., Wachovia Bank, N.A., JP Morgan Chase Bank, N.A., American Express Credit Corporation, Bank of America, Discovery Financial Services, and M Anderson Design Inc.

III. Computation of Damages Claimed

Not applicable.

IV. Insurance Agreement Available to Satisfy All or Part of a Judgment

Not applicable.

Dated: New York, New York
August 5, 2011

**INGRAM YUZEK GAINEN
CARROLL & BERTOLOTTI, LLP**

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Attorneys for the Schrager Defendants